

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DWAYNE B. SEALS,

Plaintiff,

Case Number 20-cv-11272
Honorable Sean F. Cox
Magistrate Judge Anthony P. Patti

v.

WAYNE COUNTY EMPLOYEES'
RETIREMENT SYSTEM,

Defendant.

VERDICT FORM

Question No. 1: Has Plaintiff shown that his speech was a substantial or motivating factor of the adverse action taken by the Defendant?

Yes X

No

If you answered "no" to Question No. 1, you have reached a verdict in favor of the Defendant and do not need to proceed further. Please have your elected foreperson sign the verdict form and inform the Court's Clerk. If you answered "yes" to the above question, please proceed to Question No. 2.

Question No. 2: Has Defendant proved that it would have taken the same action even if the Plaintiff had not spoken? In other words, has Defendant proven the absence of but-for causation?

Yes

No X

If you answered "yes" to Question No. 2, you have reached a verdict in favor of the Defendant and do not need to proceed further. Please have your elected foreperson sign the verdict form and inform the Court's Clerk. If you answered "no" to the above question, please proceed to Question No. 3.

Question No. 3: Please assess the amount of damages caused by the Defendant.

\$ 180,000.00

You have reached a verdict in favor of Plaintiff. Please have your elected foreperson sign the verdict form and inform the Court's Clerk.

s/Jury Foreperson

In compliance with the Privacy Policy adopted by the Judicial Conference, the verdict form with the original signature has been filed under seal.

Dated: 9/29/23